

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED

NOV 03 2003

Michael N. Milby, Clerk of Court

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IN RE ENRON CORPORATION
SECURITIES LITIGATION

: MDL-1446
:
: Consolidated Civil Action
: No. H-01-3624
:

----- x
This Document Relates To:

MARK NEWBY, et al., individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

ENRON CORPORATION, et al.,

Defendants.
----- x

THE REGENTS OF THE UNIVERSITY OF
CALIFORNIA, et al., individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

KENNETH L. LAY, et al.,

Defendants.
----- x

**AFFIDAVIT OF PETER J. DENNIN IN SUPPORT OF MOTION OF J.P. MORGAN
CHASE & CO., JPMORGAN CHASE BANK AND J.P. MORGAN SECURITIES INC.
FOR CONFIDENTIAL TREATMENT OF CERTAIN DOCUMENTS**

STATE OF NEW YORK)
 ss:
COUNTY OF NEW YORK)

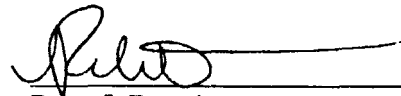
1819

Peter J. Dennin, being duly sworn, deposes and says:

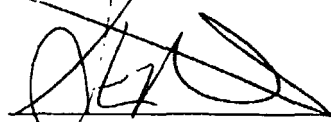
1. I am a member of the bar of the State of New York and an associate of the firm of Simpson Thacher & Bartlett LLP, counsel to defendants J.P. Morgan Chase & Co., JPMorgan Chase Bank and J.P. Morgan Securities Inc., (collectively, the "JPMC Defendants") in the above-captioned action. I submit this affidavit, and the exhibits annexed hereto, in support of the motion of the JPMC Defendants for confidential treatment of certain documents.

2. Attached hereto as Exhibit A is a true and correct copy of an Order Governing the Production and Use of Confidential Material Among the Examiner, the Official Committee of Unsecured Creditors, the Debtors and Non-Parties, entered on October 10, 2002, in *In re Enron Corp.*, Case No. 01-16034 (Bankr. S.D.N.Y.).

3. Attached hereto as Exhibit B is a true and correct copy of the Amended Stipulation and Protective Order, entered on October 18, 2002, in *Retirement Sys. of Alabama v. Merrill Lynch & Co. et al.*, Case No. CV-2002-738-H (Ala. Cir. Ct.).


Peter J. Dennin

Sworn before me this
9th day of November 2003


Notary Public

STEVE M. METRO
Notary Public, State of New York
No. 01ME5029824
Qualified in Orange County
Commission Expires July 3, 2006

The Exhibit(s) May
Be Viewed in the
Office of the Clerk